

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE	§	CHAPTER 7
	§	
LEGENDARY FIELD EXHIBITIONS, LLC.	§	CASE NO. 19-50900-CAG
	§	
AAF PLAYERS, LLC;	§	CASE NO. 19-50902-CAG
	§	
AAF PROPERTIES, LLC;	§	CASE NO. 19-50903-CAG
	§	
EBERSOL SPORTS MEDIA GROUP, INC.;	§	CASE NO. 19-50904-CAG
	§	
LFE 2, LLC;	§	CASE NO. 19-50905-CAG
	§	
WE ARE REALTIME, LLC	§	CASE NO. 19-50906-CAG
	§	
DEBTORS	§	

**(SUBSTANTIVE CONSOLIDATION
OF ALL 6 CASES, INTO ONE CASE,
LEGENDARY FIELD EXHIBITIONS,
LLC, CASE NO. 19-50900-CAG)
JOINTLY ADMINISTERED UNDER
CASE NO. 19-50900-CAG)**

**TRUSTEE’S APPLICATION TO EMPLOY
REID, COLLINS & TSAI, LLP AS SPECIAL LITIGATION COUNSEL**

THIS PLEADING REQUESTS RELIEF THAT MAY BE ADVERSE TO YOUR INTERESTS. IF NO TIMELY RESPONSE IS FILED WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF SERVICE, THE RELIEF REQUESTED HEREIN MAY BE GRANTED WITHOUT A HEARING BEING HELD. A TIMELY FILED RESPONSE IS NECESSARY FOR A HEARING TO BE HELD.

TO THE HONORABLE H. CRAIG A. GARGOTTA, U. S. BANKRUPTCY JUDGE:

Randolph N. Osherow, Trustee, the duly appointed chapter 7 trustee in the above-referenced case (“Applicant” or “Trustee”), and files this Application of Trustee to Employ Reid Collins & Tsai LLP (“RCT”), as Special Litigation Counsel (the “Application”). In support of the

Application, the Trustee relies upon the Declaration of R. Adam Swick (the “Swick Declaration”) attached hereto as **Exhibit A**, and respectfully states as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. §§ 157(b).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

3. Legendary Field Exhibitions, LLC, Ebersol Sports Media Group, Inc. and four affiliates (collectively, the “Debtors”) filed their petitions for voluntary relief under Bankruptcy Code Chapter 7 on April 19, 2019 (collectively, the “Bankruptcy Cases”).¹
4. Randolph N. Osherow was appointed as Chapter 7 Trustee thereafter and continues to serve in that capacity.
5. On the Trustee’s motion, the Court substantively consolidated the Bankruptcy Cases into, *In re Legendary Field Exhibitions*, Case No. 19-50900 [Docket No. 150].
6. The Trustee proceeded to accumulate and dispose physical property of the Debtors and has been engaged in accumulating information important to administering the estate. It appears now that the Debtors’ remaining assets comprise preference actions and potential claims against investors, former directors, officers, insiders, members and patrons arising out of their actions and omissions in connection with the Debtors’ management, oversight, capital raising, lending and operations (the “Claims”). The Claims relate to conduct that occurred in Texas and

¹ *In re Legendary Field Exhibitions, LLC*, Case No. 19-50900.
In re Ebersol Sports Media Group, Inc., Case No. 19-50904.
In re AAF Players, LLC, Case no. 19-50902.
In re AAF Properties, LLC, Case No. 19-50903.
In re LFE2, LLC, Case No. 19-50905.
In re We are Realtime, LLC, Case No. 19-50906.

elsewhere. If successful, the Claims may be covered by certain insurance policies the Debtors obtained prepetition, the proceeds of which are property of the estate. *See In re OGA Charters, LLC*, No.1740920, 2018 WL 4057525, *4-5 (5th Cir. Aug. 24, 2018).

RCT'S PROPOSED RETENTION

7. Because the Claims involve the duties and obligations of directors, officers, interested investors with control positions and other corporate agents, counsel with significant experience investigating and litigating claims involving directors and officers, including in the context of a complex bankruptcy case, are well-suited for this engagement. In the Trustee's judgment, retaining such qualified counsel to investigate the Claims and be in charge of litigation if a determination is made to pursue claims is warranted. In that regard, the Trustee proposes to employ RCT to investigate, analyze and pursue the Claims.

8. The Trustee seeks to engage RCT as special litigation counsel because of RCT's knowledge and experience in investigating and pursuing the type of Claims involved here in complex bankruptcy cases, and because RCT is willing to undertake the representation on an alternative, contingent-fee basis.

9. The Trustee understands and is informed that RCT has substantial experience in complex bankruptcy litigation and litigation against officers, directors and insiders, including claims in which RCT obtained substantial settlements for the estate. *See e.g., In re Isolux Corsan, L.L.C.*, No. 17-52777 (Bankr. W.D. Tex.); *In re KLD Technologies, Inc.*, No. 16-10345 (Bankr. W.D. Tex.); *In re Fresh & Easy, L.L.C.*, No. 15-1222 (Bankr. D. Del.); *In re AWTR Liquidation, Inc.*, No. 13-775 (Bankr. C.D. Cal.); *In re ZCO Liquidating Corp.*, No. 13-13126 (Bankr. D. Del.); *In re Belle Foods, LLC*, No. 13-81963 (Bankr. N.D. Ala.).

10. The RCT attorneys primarily responsible for representing the Trustee will be:

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11. The Trustee has determined that is appropriate and necessary to engage representation on an alternative contingent-fee basis which will reduce administration costs both by transferring the fee risk of any litigation result to RCT and by capping the amount the Trustee may be required to advance for litigation costs. Currently, considering the amount and volume of claims filed and the resources in the consolidated estate, it is unlikely that any meaningful distribution to creditors will be made. Currently, the estate does not contain sufficient value to make a meaningful distribution to creditors. The Trustee believes that obtaining representations on an alternative contingent-fee basis will conserve estate resources while retaining the services of attorneys well experienced in evaluating and pursuing the sort of Claims under circumstances this case presents.

12. Subject to the Court's approval, the Trustee and RCT have entered into a Letter of Engagement in which RCT agrees to be compensated for services on a contingent-fee basis and to be responsible for certain necessary litigation costs above the cap that the Trustee has agreed to bear (for depositions, retention of experts and the like). A true and correct copy of the Letter of Engagement is attached to the Swick Declaration as **Exhibit 1**.

13. Under the Letter of Engagement and in consideration of the risks RCT is undertaking, the Trustee has agreed, subject to the Court's approval, to pay RCT 35%² of the "Recoveries" as defined in the Letter of Engagement.³ If there are no Recoveries, RCT will not receive any contingency-fee.

14. It is expected that pursuing the litigation will involve certain expenses, which may be substantial. Under the Letter Agreement, the Trustee agreed to conduct e-discovery and to set-aside and pay, subject to Court approval, up to \$75,000 before a lawsuit is filed and up to an additional \$250,000 if a lawsuit is filed (the "Set-Aside") for the payment of necessary litigation expenses as defined in the Letter of Engagement. RCT may advance fees and expenses in appropriate instances within the Set-Aside amount and will be entitled to reimbursement of such amounts upon application to and approval by the Court. RCT will advance fees in excess of the Set-Aside and will only be reimbursed such excess amounts out of Recoveries.

15. RCT has agreed to submit fee applications to the Court periodically for earned fees and the reimbursement of necessary expenses consistent with the Letter of Engagement. RCT understands that such applications will be analyzed under 11 U.S.C. § 328(a).

16. RCT is qualified and willing to undertake its engagement in pursuing the estate's Claims described in this Motion and to pursue them to judgment if necessary. The Trustee therefore, pursuant to 11 U.S.C. §§ 327-328 and Federal Rule of Bankruptcy Procedure 2014, seeks to employ and engage RCT.

² RCT understands that the trustee's general counsel, Barrett Daffin Frappier Turner & Engel, LLP, has agreed to provide substantial work as additional special counsel if a Claim is pursued for a contingent fee of 5% of recoveries.

³ The Letter of Engagement defines Recoveries to include the "fair value of all consideration received by the Debtor and its estate in connection with the any settlement, judgment, award, or other recovery related to the Claims."

17. Other than as described in this motion and the attached Exhibit “A,” there is no proposed arrangement to compensate RCT. RCT has not received any payments from the Trustee to date. RCT has not agreed to share any compensation RCT may receive with any other party or person, except RCT’s partners, counsel and associates.

RCT’S CONNECTIONS AND LACK OF CONFLICTS

18. The Trustee is advised that RCT has investigated and continues to investigate and identify any connection with creditors or parties in interest, including former directors, officers, and insiders. To the best of the Trustee’s knowledge, other than as set forth in the Swick Declaration, none of RCT’s partners, counsel or associates hold any adverse interest or have any connection to the parties and parties in interest in this case.

19. Further, neither RCT nor any attorney at RCT: (a) holds a claim against the Debtors’ consolidated estate; (b) is a creditor, equity security holder, or an insiders of the Debtors; or (c) ever served as a director, officer, or employee of the Debtors.

20. While the results of RCT’s searches revealed no conflicts of interest regarding RCT’s anticipated representation, connections to parties in interest were revealed. Those connections are specifically described in the Swick Declaration. Each of the connections is wholly unrelated to these Bankruptcy Cases. The Trustee and RCT do not believe that either a potential conflict exists with respect to RCT’s proposed representation in this case.

21. Accordingly, the Trustee believes RCT to be a “disinterested person” as defined in 11 U.S.C. § 101(14).

WHEREFORE, the Trustee requests that the Court approve this Application and authorize him to employ RCT as special litigation counsel for the estate as of February 5, 2020.

Respectfully submitted,

BARRETT DAFFIN FRAPPIER
TURNER & ENGEL, LLP

By: /s/ Brian S. Engel

Steve Turner

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GENERAL COUNSEL FOR RANDOLPH N.
OSHEROW, CHAPTER 7 TRUSTEE

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that on the 21st day of February 2020, a true and correct copy of the foregoing document was served via electronic means or by first class mail as listed on the Court's ECF noticing system and by electronic mail to those persons filing a notice of appearance requesting notice and persons filing a proof of claim, all pursuant to the Court's order for limited notice mailing entered on the Court's docket as document no. 79.

/s/ Brian S. Engel

Brian S. Engel

Limited Mailing Matrix as of February 21, 2020

Pursuant to Order Granting Trustee's Motion to Limit Matrix (Docket No. 79)

PERSONS FILING A PROOF OF CLAIM		
Joe Bosack 1661 Oak Road Pottsville, PA 17901	Marriott International, Inc. John C Josefsberg 12740 HILLCREST RD #240 DALLAS, AZ 75230	Nicolas Larios 206 Cork Way Davenport, FL 33897
The Montag Group, LLC 14 Vanderventer Ave., Ste. 255 Port Washington, NY 11050	Pavilion Management Company dba Hilton Phoenix Mesa Hotel 1011 W Holmes Avenue Mesa, AZ 85210	Steven Shafer 1290 Rip-Jay Circle Canyon Lake, TX 78133
Steve Mariucci c/o Arnie Herz 14 Vanderventer Ave., Ste. 255 Port Washington, NY 11050	Silverman Group 436 Orange Street New Haven, CT 06511	John R Richardson 13100 Hissen Ridge Ln Clermont, FL 34715
Outdoor America Images, Inc. OAI 4545 W Hillsborough Ave Tampa, FL 33614	Renee Stout 2630 Fallbrook Dr. Oviedo, FL 32765	Ruth Palmer 1827 Schley Ave. San Antonio, TX 78210
Arizona Department of Revenue 2005 N Central Ave, Suite 100 Phoenix, AZ 85004	Embassy Suites by Hilton South Jordan Salt Lake City 10333 South Jordan Gateway South Jordan, UT 84095	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624
PRISMIC IO, Inc. 185 Alewife Brook Parkway, Suite 210 Cambridge, MA 02138	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Alan J Snyder 3315 Falling Creek San Antonio, TX 78259
SHOCK DOCTOR INC 11488 SLATER AVENUE Fountain Valley, CA 92708-5440	AAF-Arizona Hotshots Park Place Printing, Inc. 535 W Baseline Rd., Ste. 104 Mesa, AZ 85210	Jennifer L Whitmore 6022 Spring Time San Antonio, TX 78249
JDH Broadcasting LLC - Dan Hellie 324 31st St. Manhattan Beach, CA 90266	DR. JILLS FOOT PADS INC 384 S MILITARY TRAIL DEERFIELD BEACH, FL 33442	Angela Cates 27022 Foggy Meadows Street San Antonio, TX 78260-1822
Fresh Concepts, LLC 49 Research Drive Milford, CT 06460	CBT CREATIVE BROADCASTING TECHNIQUES 15 Charles Place Closter, NJ 07624	Manuel Ramirez 22702 Sabine Summit San Antonio, TX 78258-2401
Teamworks Innovations, Inc. 122 E Parrish St Durham, NC 27701	Security Industry Specialists, Inc. Attn: Tom P. Seltz, Pres. & CFO 20 West Galer Street Seattle, WA 98119	Trey Bates 215 N Center #310 San Antonio, TX 78202-2756
Safety Services, Inc. dba U.S. Safety Services 5525 Blanco Rd. Suite 124 San Antonio, TX 78216	Foot Management, Inc. 7201 Friendship Rd. Pittsville, MD 21850	Carroll William 1285 Burgundy Ct Oviedo, FL 32766-6686
James Patrick Gleason 1237 Union Club Drive Winter Garden, FL 34787-3077	VITAC Corporation 8300 E Maplewood Ave Suite 310 Greenwood Village, CO 80111	Rhinehart, Danny 11476 Willow Windermere, FL 34786

Cox Media - San Diego c/o Szabo Associates Inc. 3355 Lenox Road NE, Suite 945 Atlanta GA 30326	Broadway Media, LLC dba KALL- ESPN 700 50 West Broadway Suite 200 Salt Lake City, UT 84101	William Roberts 413 Four Seasons Ave Mascotte, FL 34753
bluemedi, Inc. Gallagher& Kennedy c/o Joe Cotterman 2575 E Camelback Road Suite 1100 Phoenix, AZ 85016	Rhino Arizona, LLC 125 W Julie Dr Tempe, AZ 85283	Gary Hortenstine 1353 Old Virginia Ct. Marietta, GA 30067
Marriott Hotel Services, Inc. dba Scottsdale Marri John C Josefsberg 12740 Hillcrest Road #240 Dallas, TX 75230	Stacie Johnson 3039 Chavez Avenue Clermont, FL 34715	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624
Jennifer Monn 3597 Gatlin Place Circle Orlando, FL 32812	Thomas A. Tarasewich 3647 All American Blvd Orlando, FL 32810	Patrick A Harrington P. O. Box 1019 Vidor, TX 77670-1019
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Anthony Hurst 4716 Valdina Way San Diego, CA 92124-2433	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Michael Hamilton 2349 N Atwood Cir Mesa, AZ 85207
April Schulze 10627 Larch Grove Ct HELOTES, TX 78023	Jones, Byron 113 Moseley Ave Eatonville, FL 32751	Eric Gelvin 4354 E. Sandia St PHOENIX, AZ 85044
Donna Winfrey 2980 Cordie Lee Lane Germantown, TN 38138-8184	Datatix - SLC 334 W Bugatti Drive Salt Lake City, UT 84115	Salene Ali 110 Sunnyland Dr San Antonio, TX 78228
LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Letty Baldit Estrada 535 W Olmos Dr San Antonio, TX 78212	Thomas Mason 7777 Glen America Drive #349 Dallas, TX 75225
Willaim J Neuls 4910 Hershey Dr San Antonio, TX 78220	Michael Reed 16165 Cayenne Ridge Rd San Diego, CA 92127	Dale A. Wellman 2692 Indigo Drive El Cajon, CA 92019
Fidelis Bookkeeping And Payroll Services 812 N Pacific St Unit C Oceanside, CA 92054	John M Tompkins 4703 Camberley Ct San Diego, CA 92154	Walter John Ellis dba Sports and Broadcast Service 12101 E Mountain View Rd SCOTTSDALE, AZ 85259
Chris Muffoletto 2781 Wassum Trail Chuluota,, FL 32766-8544	Aflanny Inc. P.O. Box 233 Rancho Santa Fe, CA 92067	Hyatt Regency Riverwalk San Antonio 123 Losoya San Antonio, TX 78205
Denise DeLoach 13214 Vista del Mundo San Antonio, TX 78216	Morris, Colin 152 NE 167 Street Suite 403 Miami, FL 33162	Cain Broadcast Traffic, LLC c/o Ava Cain 8820 SW 123rd CT. Apt. L107 Miami, FL 33186
Robert Zearfoss 2548 Rio Cordillera Boerne, TX 78006	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Ray Sprayberry Dds Msd Pa 410 N School St Boerne, TX 78006

LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Robert Callaway 12644 Brite Ranch San Antonio, TX 78245	Juleyna, LLC dba Exhibit Experts 4012 East Broadway Suite 307 Phoenix, AZ 85040
ohn Rountree 9188 Mudville Rd. Millington, TN 38053 MILLINGTON, TN 38053	Vaughn, Nia 405 Pleasant Hill Road Lilburn, GA 30047	Annotti, Mark 2170 FAIRMONT CIRCLE ORLANDO, FL 32837
Samantha Evans 539 Parkmont Ct San Antonio, TX 78258	Stieg, Frank 215 Salvador Square Winter Park, FL 32789	ohn C Maywald 39 Walnut Grove Rd Boerne, TX 78006
Daniel K. Ward 8431 Cheyenne Pass San Antonio, TX 78254	Marriott International, Inc. John C Josefsberg 12740 HILLCREST RD #240 DALLAS, AZ 75230	Nationwide Referral Company, Inc. dba Apartment & Relocation Center 11818 Wurzbach Rd. San Antonio, TX 78230
Timothy Grant 867 S. GRANT ST LONGWOOD, FL 32750-5507	Johnson Group, Inc. 9 W Country Gables Drive Phoenix, AZ 85023	Roberto Coronado 8034 Myrtle Glade Converse, TX 78109-3275
LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Teamworks Innovations, Inc. 122 E Parrish St Durham, NC 27701	Tastinger, Anthony 14867 Hawksmoor Run Circle Orlando, FL 32828
Sneaky Big Studios, LLC 15750 N. Northsight Blvd. Scottsdale, AZ 85260	WILLIAM SHAPINS 13119 LAKESHORE GROVE DR WINTER GARDEN, FL 34787	Georgia State University dba GSU Panther Dining 55 Gilmer Street Room 318 Atlanta, GA 30303
Paul M Halsey dba Admiral Video, LLC 503 E. Erie St. Suite B Lancaster, NY 14086	PCS Production Company, LP 1551 Corporate Drive Suite 125 Irving, TX 75038	Georgia State University Athletics / Georgia State University Stadium 755 Hank Aaron Dr. Atlanta, GA 30315
David Capraro 3215 River Frio San Antonio, TX 78253	Ladds 6881 Appling Farms Parkway Memphis, TN 38133	Residence Inn by Marriott Orlando Downtown 680 N Orange Ave Orlando, FL 32801
Scott Enos 14718 Eagles Crossing Drive Orlando, FL 32837-6923	William Michael Murray 4019 Conway Place Circle Orlando, FL 32812	Royal Restrooms Mountain West, LLC 563 N Colorado St Salt Lake City, UT 84116
Edward Lepp dba Leppdesign, LLC 320 North Shadowwood Drive St. Augustine, FL 32086	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Thomas Ward 612 Angelica Circle CARY, NC 27518
Stewart Ogier 9238 Brae Moss San Antonio, TX 78249	Chrystal Davis 1017 Margot Ln Lake Wales, FL 33853	Steve Wolff 2131 Palomar Airport Rd Ste 330 Carlsbad, CA 92011
Donna Franklin 6050 Brunswick Rd. Lakeland, TN 38002	Thomas S. Knuckey 310 W. Hornbeam Drive Longwood, FL 32779	F&F Productions 14333 Myerlake Circle Clearwater, FL 33760
Lindsay Skousen 459 Virginia Drive Winter Park, FL 32789	Rick and Tammy Colsell 3128 Guiltoy Ave San Diego, CA 92117-2540	EM Printing, LLC 3081 Bartlett Corporate Dr. Bartlett, TN 38133

Flying V Group 2051 Placentia Ave. Costa Mesa, CA 92627	TOP Marketing USA c/o Jonathan Hodgins 1332 Baur Blvd St. Louis, MO 63132	John Evangelist 2669 Eltinge Drive P.O. Box 2637 Alpine, CA 91903
Green, Nicholas 18626 Creekside Pass San Antonio, TX 78259	Signal Wiz - Technical Services 6822 Fisk Avenue San Diego, CA 92122-2437	Atlanta Journal-Constitution c/o Szabo Associates Inc. 3355 Lenox Road NE, Suite 945 Atlanta GA 30326
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Joy R Wilson 15330 75 Ave N Palm Beach Gardens, FL 33418	CLIFF KEEN ATHLETIC 4480 VARSITY DR ANN ARBOR, MI 48106	Lopez, Jake 8922 Summer Trail San Antonio, TX 78250
John & Teresa Markey 5508 Redland Dr San Diego, CA 92115-2215	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Brenda Sue Shavers 574 Terry Street SE Atlanta, GA 30312-2838
LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Big Fogg, Inc. 42095 Zero Dr. Unit A2 Temecula, CA 29590	CaliVenture Party Rentals 5562 Las Alturas Terrace San Diego, CA 92114
Decker, Shawn 17525 Silver Creek Ct Clermont, FL 34714	TNT GameTruck, LLC 26788 Rhapsody Ct menifee, CA 92584	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624
A Bounce Above Party Rentals 13745 Lyall Place Lakeside, CA 92040	Nicholas L McLain 3753 E Fairfield Street Mesa, AZ 85205	High Rise Audio 6783 S 2300 E Salt Lake City, UT 84121
Campbell Clinic Orthopedics 1400 South Germantown Road Germantown, TN 38138	Ford, Steve 3275 Madison Ave San Diego, CA 92116	Kohlhausen, Susan 5918 Tivoli Gardens Blvd Orlando, FL 32829
Prospect Productions LLC dba Barnicle 175 Varick St. 2nd floor New York, NY 10014	IHEARTMEDIA + ENTERTAINMENT, INC. Herzlich & Blum, LLP 15760 Ventura Blvd. Suite 700 Encino, CA 91436	ICM Partners - Terrell Davis 10250 Constellation Blvd. 31st floor Los Angeles, CA 90067
Jason Zone Fisher 128 South Kilkea Drive Los Angeles, CA 90048	Florida Medical Distributors, LLC 123 Barrier Isle Drive Ormond beach, FL 32176	Rheinbold, Jim 10437 La Morada Dr San Diego, CA 92124
CenturyLink Communications, LLC 1025 El Dorado Blvd. (Legal-BKY) Broomfield, CO 80021	Down In Front Productions, LLC 1318 Alford Ave, Suite 201 Hoover, AL 35226	Lori Ollier 31459 Sonoma Lane Temecula, CA 9259
Jose Hernandez 1681 San Altos Place Lemon Grove, CA 91945	Contemporary Services Corporation - CSC 17101 Superior St. Northridge, CA 91325	Aramark Sports and Entertainment Services, LLC c/o Duane Morris LLP - Attn: Jarret P. Hitchings 222 Delaware Avenue, Ste. 1600 Wilmington, DE 19801
San Antonio Express c/o Zalina Tsarakova 4747 Southwest Frwy. Houston, TX 77027	Theodore J Cottrell 4580 Regency Trace,SW Atlanta, GA 30331	Bruce D. Fikes 113 W Huff Ave San Antonio, TX 78214

Carolyn J. Downey 7450 Olivetas Avenue Apartment 40 La Jolla, CA 92037	John Russell 3642 Terrace Place Carlsbad, CA 92010-6593	PCH TRIBUNE LLC DBA NUMBER SIX LLC 4770 S 5600 W West Valley City, UT 84118
Jim Wadley 786 West Solana Circle Solana Beach, CA 92075	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	AY Productions LLC 1334 Park View Avenue #250 Manhattan Beach, CA 90266
NBCUniversal Media, LLC 30 Rockefeller Plaza (1221 Campus) New York, NY 10112	John F Goddard 1833 Wind Willow Rd Belle Isle, FL 32809	Lawrence (Larry) D. Park 109 Oakwood Dr. Cumming, GA 30040
Engstrand, William 1505 South Siliverstone Ct. Orange City, FL 32763	Kelly Ann MacDonald 1923 San Jose Ave San Francisco, CA 92114	WinCraft, Incorporated 960 E Mark St Winona, MN 55987
Stallard, Diane 1503 South Silverstone Court Orange City, FL 32763	Simplified Coach, Inc. 14051 Saratoga-Sunnyvale Rd. Saratoga, CA 95070	School of Health Corp. 6764 Eagle Way Chicago, IL 60678-1067
Five Marketing & Management LLC 925 B Street #603 San Diego, CA 92101	Big Ticket Inc. (Rich Waltz) 820 5th Ave. NW Issaquah, WA 98027	Hines Ward Jr. Knox Law Firm 120 West Tenth Street Erie, PA 16501
Kenneth Watson 3503 Tree Crossing Parkway, Birmingham, AL 35244	Blake Beddingfield 828 Woodburn Dr Brentwood, TN 37027	Shaun O'Hara 60 Soho Consulting, LLC c/o Aaron C. Smith Locke Lord LLP 111 South Wacker Drive Chicago, IL 60606
Nicole Varner 221 Crumley St. SW Atlanta, GA 30312	Holiday Inn Riverwalk 217 N. St. Marys Street San Antonio, TX 78205	Hubbard Radio Phoenix, LLC 1100 N 52nd St Phoenix, AZ 85008
CMAXIII Entertainment/ Charles Sloan Jr. 24245 Wilderness Oak Apt #3310 San Antonio, TX 78258	Cox Media - San Diego c/o Szabo Associates Inc. 3355 Lenox Road NE, Suite 945 Atlanta GA 30326	Won Worldwide, LLC c/o Nicholas Cutaia Goulston & Storrs PC 885 Third Avenue New York, NY 10022
BUCKS BAGS, INC. 2401 W MAIN ST BOISE, ID 83702	Blue Cross of California d/b/a Anthem Blue Cross Anthem Blue Cross Life and Health Insura c/o Shipman & Goodwin LLP One Constitution Plaza Hartford, CT 06103	MGM RESORTS INTERNATIONAL OPERATIONS, INC. SAMUEL A. SCHWARTZ, ESQ. 100 N CITY PARKWAY, STE 1600 LAS VEGAS, NV 89106
Three Sisters Partnership c/o Russell W. Savory BEARD & SAVORY , PLLC 119 South Main St., #500 Memphis, TN 38103	NEP Supershooters, LP c/o Paul Mazeski, Esq. 301 Grant Street, 20th Floor Pittsburgh, PA 1521	Deseret Digital Media INC David Pearce PO Box 45654 Salt Lake City, UT 84145
Weber, Jake 1120 Ecology Loop Eads, TN 38028	3636 merrimac ave san deigo, CA 92117	Delta Dental of California Phillip K. Wang, Esq. RIMON, P.C. One Embarcadero Center, Suite 400 San Francisco, CA 94111

1715 Aaron Brenner Drive Suite 800 1291 Tully Street 1715 Aaron Brenner Drive Suite 800 Memphis, TN 38107	Creditor Texas Comptroller of Public Accounts c/o Office of the Attorney General Bankruptcy - Collections Division MC-008 PO Box 12548 Austin TX 78711-2548	Sequoia One PEO, LLC 1850 Gateway Dr. Suite 700 San Mateo, CA 94404
Tri-C Club Supply, Inc. 32615 Park Lane Garden City, MI 48135-1528	Texas Comptroller of Public Accounts c/o Office of the Attorney General Bankruptcy - Collections Division MC-008 PO Box 12548 Austin TX 78711-2548	IGG Consulting, LLC 8100 La Mesa Blvd suite 105 La Mesa, CA 91942 La Mesa, CA 91942
Embassy Suites San Antonio Riverwalk Downtown 125 East Houston St. San Antonio, TX 78205	John Larios 8222 Manderly PL Converse, TX 78109	Swirl Inc. c/o Davis & Gilbert LLP Attn: Massimo Giugliano 1740 Broadway New York, NY 10019
nerdmatics 8149 Santa Monica Blvd #404 West Hollywood, CA 90046	Gray, Michael 9262 Dames Rocket Pl, Las Vegas, NV 89148	Jake Bennett c/o Bryan and Cathy Bennett 4653 S Vivian Court Morrison, CO 80465-1851
LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 0762	Colton Schmidt and Reggie Northup c/o Jonathon Farahi, Esq. Abir Cohen Treyzon Salo LLP 16001 Ventura Blvd, Suite 200 Encino, California 91436	Carey International, Inc. c/o Greenberg Traurig LLP, Attn: Thomas McKee 1750 Tysons Boulevard, Suite 1000 McLean, VA 22102
Dundon Capital Partners, LLC c/o Russell W. Mills Bell Nunnally & Martin LLP 2323 Ross Avenue, Suite 1900 Dallas, TX 75201	Lexington Hotel Conference Center Jacksonville Riverwalk 1515 Prudential Drive Jacksonville, FL 32207	00 South Ashley Property Owner, LLC Locke Lord LLP Attn: Brian A. Raynor 111 S Wacker Drive Chicago, IL 60606
Thomas G. Dundon c/o Russell W. Mills Bell Nunnally & Martin LLP 2323 Ross Avenue, Suite 1900 Dallas, TX 75201	Law Enforcement Specialists Inc PO Box 11656 Glendale, AZ 85318-1656	Sodexo, Inc. 9801 Washingtonian Blvd. Gaithersburg, MD 20878
wilford coleman jr 2121 Pioneer Pass Seguin, TX 78155	War Machine Inc dba TSHIRTGUN.COM 3429 Rutherford Rd Ext Ste B Taylors, SC 29687	Synergy Specialists Medical Group, Inc. 4910 Directors Place Suite 350 San Diego, CA 92121
Rush Glick 1651 Vann Court El Cajon, CA 92020-2236 El Cajon, CA 92020-2236	SAFC Management One AT&T Parkway San Antonio, TX 78219	Landmark American Insurance Company c/o Tony L. Draper Walker Wilcox Matousek, LLP 1001 McKinney, Suite 2000 Houston, TX 77002
Cortez Liquid Waste Services 19540 S US Highway 281 San Antonio TX, 78221	Classic Traditions, Inc. 4 Baltusrol Ct. Shoal Creek, AL 35242	LEGENDARY FIELD EXHIBITIONS, LLC

		15 Charles Place Closter, NJ 07624
TRT Development Company-San Antonio c/o Wick Phillips Attn: Jason Rudd 3131 McKinney Ave., Suite 100 Dallas, TX 75204	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Williams, Jack F. 1355 Christmas Lane NE Atlanta, GA 30329 US
Marriott Hotel Services, Inc. John C Josefsberg 12740 HILLCREST RD #240 DALLAS, AZ 75230	Lexington Hotel Conference Center Jacksonville Riverwalk 1515 Prudential Drive Jacksonville, FL 32207	Xandr One AT&T Way Room 3A104 ATTN: Karen Cavagnaro Bedminster, NJ 07921
Emily Morgan, LLC 705 East Houston Street San Antonio, Texas 78205	Architectural Surfaces & Design Inc. 5526 West 13400 South Herriman, UT 84096	1954 Productions, LLC 8447 Wilshire Boulevard, Ste 300 Beverly Hills, CA 90211
UTAH MEDIA GROUP 4770 S 5600 W WEST VALLEY CITY, UT 84118	Thomas A. Veit c/o Stephen A. Roberts Clark Hill Strasburger 720 Brazos, Suite 700 Austin, TX 78701	Wehbe, Freddie PO Box 140911 Gainesville, FL 32614
IsoLynx, LLC Attn: Ed Evansen, CEO 179 Ward Hill Avenue Haverhill, MA 01835	Marriott Plaza San Antonio 555 S, Alamo San Antonio, TX 78205	Silicon Valley Bank Jennifer F. Wertz Jackson Walker LLP 100 Congress Avenue, Suite 1100 Austin, TX 78701
Mathis, Chaewis 1894 Janet Lane Decatur, GA 30035	Marriott Memphis East 5795 Poplar Avenue 14185 Dallas Parkway, Suite 1150 Memphis, TN 38119	Larry Mac Duff % Kasey C. Nye Esq., WATERFALL, ECONOMIDIS, CALDWELL, HANSHAW & VI 5210 E. Williams Circle, Suite 800 Tucson, AZ 8571
Stratos, Inc. DBA ServiceMaster by Stratos Jason P. Hood Davies Hood PLLC 1910 Madison Ave., PMB 72 Memphis, TN 38104-2620	Clear Gear 354 N Lewis Rd #149 Royersford, PA 19468	Richard Muirbrook and all similarly situated emplo c/o Joshua W. Wolfshohl Porter Hedges LLP 1000 Main Street, 36th Floor Houston, TX 77002
LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Christopher Kuehn 2516 Martha Ave, Green Bay, WI 54301	University of Utah (University System of Utah) 451 1400 E Salt Lake City, UT 84112
ALT Systems, Inc. 2777 Ontario Street Suite 210 Burbank, CA 9150	eClinicalWorks LLC 2 Technology Drive Westborough, MA 01581	Padilla, Gustavo 804 Coldbrook Court Chula Vista, CA 91913
Crew One Productions, Inc. c/o Waller Lansden Dortch & Davis, LLP Attn: Blake D. Roth, Esq. 511 Union Street, Suite 2700 Nashville, TN 37219	Colette McCue 4360 Berry Oak Drive Apopka, FL 32712-5793	CenturyLink Communications, LLC Attn: Legal-Bankruptcy fka Qwest Communications Company 1025 El Dorado Blvd. Broomfield, CO 80021

ATLANTIC COAST ORTHOPAEDIC MEDICAL SUPPLIES, INC. 6510 Northpark Blvd Charlotte, NC 28216-2367	NFL Enterprises LLC Lowenstein Sandler LLP Attn: Jeffrey Cohen 1251 Avenue of the Americas New York, NY 10020	Johnson, Michael and Melvia 1238 Roman Point Dr. Norcross, GA 30093
Morgan, Lewis & Bockius 1701 Market Street Philadelphia, PA 19103	Control Dynamics Corporation 960 Louis Drive Warminster, PA 18974	CT Corporation 28 Liberty St, 42nd Floor New York, NY 10005
Chris Amaker 2313 Lockhill Selma, suite 180 SAN ANTONIO, TX 78230	HALO Branded Solutions, Inc. 1500 Halo Way Sterling, IL 61081	CT Corporation 28 Liberty St, 42nd Floor New York, NY 10005
Diaz, Jana 13334 Stetson Trl San Antonio, TX 78223	San Diego Sportservice, Inc. dba Delaware North c/o James C. Thoman, Esq. - Hodgson Russ 140 Pearl Street, #100 Buffalo, NY 14202	Lien Solution 28 Liberty St, 42nd Floor New York, NY 10005
Gutierrez, Doretta 25002 Cooper Valley San Antonio, TX 78255	Prince Shonola 1200 Holden Avenue Apt 102 Orlando, FL 32839	Kenneth Lantz 7306 Crownpiece Street San Antonio, TX 78240
Ieroy thompson 968 kings highway Apt P-15 west deptford, NJ 08086	SkyCam, LLC J. Scott Rose Jackson Walker LLP 112 E Pecan Street, Suite 2400 San Antonio, TX 78205	Kirven, Korren N. 918 Early Street, Lynchburg, VA 24503
Belz Construction Services, LLC Butler Snow c/o Mike Less 6075 Poplar Ave., Suite 500 Memphis, TN 38119	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Control Dynamics Corp. 960 Louis Drive Westminster, PA 18974
Accolade USA Inc. 60 Industrial Parkway Ste. 397 Cheektowaga, NY 14227-2774	New Era Cap Co., Inc. Phillips Lytle LLP Attn: Angela Z. Miller, Esq. One Canalside, 125 Main Street Buffalo, NY 14203	Push Button Films 5165 Galt Way San Diego, CA 92117
UCF Athletics Association, Inc. 4465 Knights Victory Way, Orlando, FL 32816	Cynthia Frelund - WME Entertainment, LLC 11 Madison Ave. 18th fl. New York, NY 10010	LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624
LMREC III CLO I REO I, Inc. % Stutzman, Bromberg, Esserman & Plifka Attn: Heather J. Panko 2323 Bryan Street, Suite 2200 Dallas, TX 75201	G&G Outfitters, Inc. 4901 Forbes Blvd Attn.: Dan Brady Lanham, MD 2070	HENRY SCHEIN, Inc. 135 Duryea Rd Melville, NY 11747
Florida Department of Revenue Mark Hamilton P.O. Box 6668 Tallahassee, FL 32314-6668	Memphis 310262 AAF Kathleen Hennessey Gannett Co. Inc. Law Dept, 7950 Jones Branch Dr. McLean, VA 22107	ADVANCE LOCAL MEDIA LLC DBA ALABAMA MEDIA GROUP ATTN CREDIT DEPT/KARINE MARTIROSYAN ONE HARMON PLAZA, 9TH FLOOR SECAUCUS, NJ 07094

MNI Targeted Media c/o Szabo Associates, Inc 3355 Lenox Road NE, Suite 945 Atlanta, GA 30326	Ohio Bureau of Workers' Compensation PO Box 15567 Columbus, OH 43215-0567	Entercom Communications Inc. 335 New Commerce Blvd Hanover Twp, PA 18706
LEGENDARY FIELD EXHIBITIONS, LLC 15 Charles Place Closter, NJ 07624	Leah McDonald 233 W Mistletoe Ave SAN ANTONIO, TX 78212	Debra Baum 1509 E. Washington Ave., #12 El Cajon, CA 92019
Street & Smiths Sports Group c/o Szabo Associates, Inc 3355 Lenox Road NE, Suite 945 Atlanta, GA 30326	First Insurance Funding P.O Box 7000 Carol Stream, IL 60197-7000	
PERSONS FILING A NOTICE OF APPEARANCE AND REQUESTING NOTICE		
Three Sisters Partnership c/o Russell W. Savory Beard & Savory, PLLC 119 South Main Street Suite 500 Memphis, Tennessee 38103		
Arizona Board of Regents, a body corporate for and on behalf of Arizona State University c/o Robert M. Charles, Jr. Lewis Roca Rothgerber Christie LLP One South Church Avenue, Suite 2000 Tucson, AZ 85701-1611		
Security Industry Specialists c/o Wayne R. Tery. Esq.- File No: 3991-20190386 IEMAR, ROUSSO & HEALD, LLP 15910 Ventura Boulevard, 12th Floor Encino- California 91436-282		
CBS TV Networks, Inc. c/o WEIL, GOTSHAL & MANGES LLP Alfredo R. Pérez 700 Louisiana Street, Suite 1700 Houston, Texas 77002		
CBS TV Networks, Inc. c/o WEIL, GOTSHAL & MANGES LLP Yehudah L. Buchweitz and Garrett A. Fail 767 Fifth Avenue New York, New York 10153		
LMREC III CLO I REO I, INC. c/o Heather J. Panko Stutzman Bromberg, Esserman & Plifka, A Professional Corporation		

2323 Bryan Street Suite 2200 Dallas, Texas 75201		
IsoLynx, LLC c/o Lathrop Gage, LLP Attn. Raymond J. Urbanik 2101 Cedar Springs Road, Suite 1400 Dallas, TX 75201		
IsoLynx, LLC c/o Lathrop Gage, LLP Attn. Wendi Alper-Pressman 7701 Forsyth Blvd., Suite 500 St. Louis, MO 63105		
Kristen A. Miller Reinsch TRT Holdings, Inc. 4001 Maple Avenue Suite 600 Dallas, Texas 75219		
Cynthia Freuhand c/o Aaron C. Smith LOCKE LORD LLP 111 South Wacker Drive Chicago, IL 60606		
Cynthia Freuhand c/o Stephen J. Humeniuk LOCKE LORD LLP 600 Congress Ave., Suite 2200 Austin, TX 78701		
Zachary Hospitality, LLC c/o Roderick J. Regan 11118 Wurzbach, #101 San Antonio, TX 78230		
Alpha Entertainment, LLC c/o Artoush Varshosaz K&L Gates LLP 1717 Main Street, Suite 2800 Dallas, Texas 75201		
Dundon Capital Partners, LLC and Thomas G. Dundon c/o Russell W. Mills Bell Nunnally & Martin LLP 2323 Ross Avenue, Suite 1900 Dallas, Texas 7520		
Pavillion Management Company c/o Jonathan L. Howell Glast, Phillips & Murray, P.C. 14801 Quorum Drive, Ste. 500 Dallas, Texas 75254		
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Courtney J. Hull Assistant Attorney General bk- c/o Sherri K. Simpson, Paralegal		

Attorney General's Office Bankruptcy & Collections Division P.O. Box 12548 Austin, TX 78711-2548		
ShaunO'Hara and 60 Soho Consulting, LLC c/o Aaron C. Smith LOCKE LORD LLP 111 South Wacker Drive Chicago, IL 60606		
ShaunO'Hara and 60 Soho Consulting, LLC c/o Stephen J. Humeniuk LOCKE LORD LLP 600 Congress Ave. Suite 2200 Austin, TX 7870		
Reggie Northrup and Colton Schmidt c/o Joshua L. Hedrick Katharine Battaia Clark Britton D. McClung Hedrick Kring, PLLC 1700 Pacific Avenue, Suite 4650 Dallas, Texas 75201		
Landmark American Insurance Company c/o Tony L. Draper WALKER WILCOX MATOUSEK, LLP 1001 McKinney Suite 2000 Houston, Texas 77002		

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE	§	CHAPTER 7
	§	
LEGENDARY FIELD EXHIBITIONS, LLC.	§	CASE NO. 19-50900-CAG
	§	
AAF PLAYERS, LLC;	§	CASE NO. 19-50902-CAG
	§	
AAF PROPERTIES, LLC;	§	CASE NO. 19-50903-CAG
	§	
EBERSOL SPORTS MEDIA GROUP, INC.;	§	CASE NO. 19-50904-CAG
	§	
LFE 2, LLC;	§	CASE NO. 19-50905-CAG
	§	
WE ARE REALTIME, LLC	§	CASE NO. 19-50906-CAG
	§	
		(SUBSTANTIVE CONSOLIDATION
DEBTORS		UNDER CASE NO. 19-50900-CAG)

**DISCLOSURE OF COMPENSATION UNDER 11 U.S.C. § 329
AND BANKRUPTCY RULE 2016(b)**

I certify that Reid, Collins & Tsai LLP (“the Firm”), subject to the Court’s approval of the Trustee’s Application To Employ Reid, Collins & Tsai LLP as Special Litigation Counsel for the Estate (the “Application”), is the special litigation counsel for the estate in the above-named case and that the compensation paid or agreed to be paid to the Firm for services rendered, or to be rendered, on behalf of the estate in or in connection with a case under Title 11 of the United States Code, such payment or agreement having been made after one year before the date of the filing of the petition, is as follows:

As set forth in the Application and the Letter of Engagement attached thereto as Exhibit “A.”

No retainer, compensation or other payment has been received by the Firm thus far in connection with its employment by the trustee in this case.

All fees and expenses to be paid to the Firm are subject to prior approval by the Court after notice as required by law.

The Firm has not agreed to share this compensation with any other person or firm.

Dated: February 20, 2020.

/s/ R. Adam Swick
R. Adam Swick, Partner